

**OFFICE OF ENVIRONMENTAL SAFETY
AND QUALITY
ACTIVITY REPORT**

June through September 2003



October 2003

U.S. Department of Energy
Office of River Protection
P.O. Box 450, H6-60
Richland, Washington 99352

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OFFICE OF ENVIRONMENTAL SAFETY AND QUALITY (ESQ)

ACTIVITY REPORT

JUNE 2003 THROUGH SEPTEMBER 2003

1.0 BACKGROUND

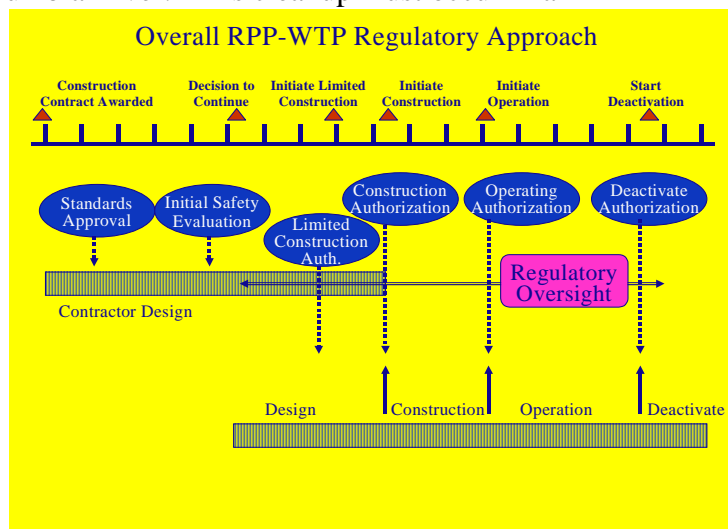
As directed by Congress in Section 3139 of the Strom Thurmond National Defense Authorization Act for Fiscal Year 1999, the U.S. Department of Energy (DOE) established the Office of River Protection (ORP) at the Hanford Site to manage the River Protection Project. ORP is responsible for the safe storage, retrieval, treatment, and disposal of the high level nuclear waste stored in the 177 underground tanks at Hanford.

The mission of the River Protection Project is to retrieve and treat Hanford's tank waste and close the tank farms to protect the Columbia River. This cleanup must occur in an environmentally sound, safe, and cost-effective manner. The role of the WTP Safety Regulation Division (OSR) a division of ESQ, is to regulate the radiological, nuclear, and process safety aspects of this effort.

DOE patterned its safety regulation of the RPP Waste Treatment and Immobilization Plant (WTP) Contractor to be consistent with the concepts and principles of good regulation (reliability, clarity, openness, efficiency, and

independence) used by the U.S. Nuclear Regulatory Commission (NRC). In addition, the DOE principles of integrated safety management are built into the regulatory program for design, construction, operation, and deactivation of the facility. The regulatory program for nuclear safety permits waste treatment services to occur on a timely, predictable, and stable basis, with attention to safety consistent with oversight that would occur from an external agency.

The OSR actively solicits questions, comments, or requests for further information and will try to meet the specific needs of interested groups and individuals. The OSR can be reached via the website feedback form, through e-mail at osrfeedback@rl.gov or by telephone at (509) 376-6727.



2.0 OSR REGULATORY ACTIVITIES

Significant progress continues on the River Protection Project, Project W-530, WTP. Construction is well underway on the WTP, including the placement of the project's first structural steel, and completion of facility foundations, and some interior and exterior walls.

On the Pretreatment Facility, 80% of the basemat concrete has been installed (36,000 cubic yards). In the walls, 10% of the concrete (4,300) has been poured: all basemat formwork, rebar and concrete has been installed for the Low-Activity Waste Facility; 54% of the walls (4,400 cubic yards) have been poured; and 3% of the High-Level Waste Facility walls have been installed through September 2003 (1,100 cubic yards).



Underground utility excavation on the east side of the Pretreatment Facility.



Curing blankets on a recently completed High-Level Waste Vitrification Facility wall concrete placement.



Phase II steel erection progress in the northwest corner of the Low-Activity Waste Vitrification Facility.



Balance of Facilities water treatment tank foundation progress.

The OSR provided the detailed construction authorization reviews and construction authorization recommendations to the ORP Manager in 2002. In 2003, the focus has been on WTP design reviews, structural assessment, authorization basis updates, and preparation for the review of the contractor updated Preliminary Safety Analysis Report (PSAR), which began September 30, 2003. The five-volume PSAR covers all WTP facilities. The review will evaluate changes to the authorization basis and changes in the radioactive source term resulting in changes to the accident severity levels or design basis events (DBEs). This extensive review is scheduled to be completed by December 15, 2003.

2.1 Defense Nuclear Facility Safety Board (DNFSB) Interface

During the months of June through September, the Office of River Protection (ORP) continued to provide updates and all relevant data to DNFSB staff and Board consultants on resolution of emerging issues.

In June, the DNFSB staff made a number of requests for information in advance of a meeting on the methodology to be used in the WTP Structural Analysis Report. The information request included general arrangement drawings and model layout used in structural analysis models. DNFSB members observed a fire protection meeting and conducted a review of concrete subsidence. These activities resulted in a limited number of follow-up requests for information.

In July, the DNFSB site representative questioned the process of allowing to omit, without ORP approval, the automatic fire suppression and detection systems in some areas of the WTP. Bechtel National, Inc. (BNI) submitted an Authorization Basis Amendment Request (ABAR) to ORP in May 2003 requesting the omission of automatic fire suppression systems in several areas of the High Level Waste (HLW), Low Activity Waste (LAW), and Pretreatment (PT) buildings. Following discussions with BNI and U.S. Department of Energy (DOE), Office of Environmental Management (EM) fire protection personnel, ORP developed and transmitted to BNI acceptance criteria that, if satisfied, permit BNI to omit sprinklers in those areas of the WTP that meet the criteria. Prior to their use, the criteria must be validated using the approved BNI standards setting process. Following their validation, BNI will include the criteria in the SRD. [Criteria approved in SRD, Volume 2, Rev 2J, Appendix K on August 15, 2003].

During August, ORP held technical and administrative sessions with DNFSB staff and responded to their requests for technical information. In their oversight of CH2M HILL Hanford Group, Inc. (CH2M HILL) activities, the DNFSB staff focused on a Tank Farms contamination event, the related root cause analysis, and subsequent corrective actions. The staff probed the effectiveness of corrective actions. The staff also examined progress on the Documented Safety Assessment (DSA) and questioned assumptions used in the DSA.

In their oversight of BNI activities, the DNFSB staff continued to meet with BNI and the WTP line organization to resolve concerns related to concrete subsidence and recent problems with concrete strength. The staff also asked a series of technical questions related to the ability of the engineering effort, the research and design effort, and the safety documentation effort to support the aggressive construction schedule.

In September, ORP continued to provide updates and all relevant data to DNFSB staff and Board consultants on resolution of the low strength concrete issue. Additionally a number of technical and administrative sessions were held. The Board had a number of questions on the calculation performed to establish that the two models used in the seismic analysis of HLW building exhibit comparable overall dynamic response. Discussions included proposed actions in response to the Board's letter on ground motion uncertainty and a review of the recently extracted HLW concrete cores. ORP and BNI staff addressed questions on 28-day concrete strength test, criteria for reaccepting concrete mixes, the status of the low strength concrete root cause analysis, and path forward to resolution.

ORP and DNFSB staff also reviewed materials selection and use, erosion/corrosion, safety related piping and piping procurement, feed receipt and feed evaporation systems, hydrogen generation, pulse jet mixers, and the status of the PSAR. The staff has particular concern about changes to the Cesium Ion Exchange columns that allow hydrogen accumulation, as opposed to continuous purging. BNI continues to examine that design change.

http://www.hanford.gov/osr/documents/03-OSR-0013_DNFSB_response_from_Roy_to_Roberso.PDF

2.2 Dangerous Waste Permit for the WTP

On July 25, 2003, State of Washington Department of Ecology (Ecology) issued a decision to modify the Hanford Facility RCRA permit to incorporate several WTP permit design packages. The modification includes four LAW permit design packages for the construction of elevation – 21 ft. secondary containment, radioactive liquid waste disposal system tanks and ancillary equipment, and a container storage area. The modification also includes five Pretreatment Facility permit design packages for the construction at elevation 0 ft. of plant wash and disposal system tanks and ancillary equipment, a containment building, and secondary containment for tanks and the miscellaneous treatment units (evaporators).

On September 9, 2003, Ecology notified DOE of its decision to incorporate 12 design packages into the Resource Conservation and Recovery Act (RCRA) Permit. The public comment period for these packages ended on September 3, 2003, with no significant comments. [The permit decision is effective October 9, 2003.] A request to allow construction to proceed will be submitted for the HLW secondary containment package since construction is scheduled to begin on installation of stainless steel liners.

Ecology issued a temporary authorization to allow construction on underground waste transfer lines and piping in the LAW Vitrification facility to proceed in advance of a final permit decision. The permit design packages will be incorporated into the permit in a future modification of the WTP portion of the Hanford Facility RCRA Permit. Construction may proceed with the understanding that future public comment may impact construction activities. This is considered very low risk since, to date, there have not been any significant public comments on WTP permit modifications.

2.3 Internal review of Preliminary Draft Tank Closure Environmental Impact Statement (EIS)

ORP staff prepared for the first review of the preliminary draft tank closure EIS, scheduled for August 13 through 19, 2003. The review team consisted of selected stakeholders, Ecology (who is a cooperating agency), DOE-Headquarters personnel and technical leads. The purpose of the review is to ensure that the information presented can be understood and that the technical information presented is accurate. The internal review of the Preliminary Draft EIS was completed on September 19, 2003.

2.4 WTP Preliminary Safety Analysis Report (PSAR)

BNI submitted the WTP PSAR update to ORP on September 30, 2003, and an ORP review is underway. The five-volume PSAR covers all WTP facilities. The review will evaluate changes to the authorization basis and changes in the radioactive source term resulting in changes to the

accident severity levels or DBEs. This extensive review is scheduled to complete by December 15, 2003.

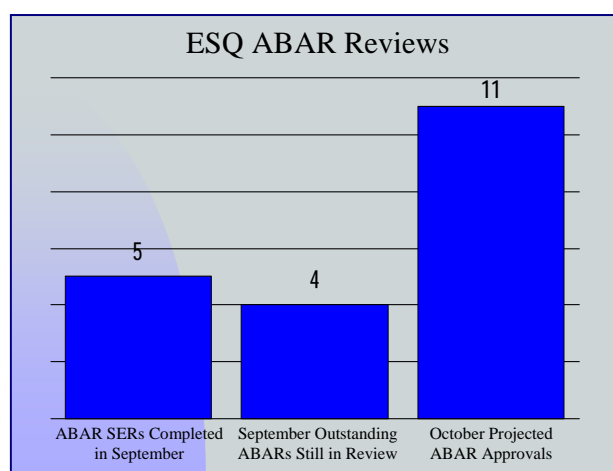
2.5 Authorization Basis Amendment Requests (ABAR)

During this reporting period, most issues with these requests were resolved, but a critical few remain as of September 2003. These include: BNI postponement for responding to questions concerning the safety criteria for removal of the shield door interlocks, which is delaying resolution of this ABAR; ORP concerns with the maintainability of the pretreatment process piping if the BNI requested changes are made to the design; and, slow provision of the BNI dynamic analysis for the HLW Building, in particular the near-term wall methodology.

BNI has developed target schedules for future submittals of ABARs. This pre-planning allows improved ORP preparation for upcoming reviews.

A simplified process for the Safety Requirements Document (SRD) daughter standards ABAR was approved, permitting the cancellation of four other ABARS, and eliminating the necessity for DOE approval of daughter standards. Also, the removal of one of three emergency electrical generators was approved. The report can be accessed through the following web link:

<http://www.hanford.gov/osr/documents/03-OSR-0321%20Approval%20Letter%20ABAR-03-551.pdf>



Ten new ABARs are currently forecasted for submittal by BNI in October, four in November, and three in December 2003.

2.6 Preliminary Notice of Violation (PNOV)

On August 29, 2003, DOE issued a PNOV and Proposed Imposition of a Civil Penalty of \$82,500 against CH2M HILL. The PNOV described violations of nuclear safety requirements related to operations of the Hanford Tank Farms. The issues involved inadvertent de-energization of annulus leak detectors, dilution tank overfills, and dome loading controls, during the period of August 2002 to November 2002. In accordance with the Enforcement Policy, 10 CFR 820, Appendix A, the issues described above resulted in three severity Level II violations.

The three violations were as follows:

- Work Processes (10 CFR 830.122(e)(1)) - Civil Penalty \$27,500
- Quality Improvements (10 CFR 830.122(c)(2) and (3) – Civil Penalty \$27,500
- Information Requirements (10 CFR 820.11(a) and (b) – Civil Penalty \$27,500

CH2M HILL admitted the violations, included payment of the civil penalty and requested no

additional mitigation in their response dated September 24, 2003. The Contractor's response was accepted by DOE October 7, 2003.

2.7 Project Management Plan (PMP)

The ESQ FY2004 PMP was completed one month ahead of schedule. The PMP includes the technical, schedule and cost baseline plans for all ESQ work scope this next fiscal year. All FY2004 work performance will be tracked against this baseline plan.

2.8 Support Services Contract Transition

Actions to consolidate ORP support service work activities within one contract, awarded to Project Assistance Corporation, a small woman-owned business, continue with solid progress. All Fiscal Year (FY) 2004 support service subcontract agreements and Work Plans were completed by September 30, 2003, for an October 1, 2003, startup.

2.9 Submittal of Annual Integrated Safety Management System (ISMS) Declaration

ORP drafted its annual ISMS declaration. The contractors (CH2M HILL and BNI) prepared summaries of ISMS activities since February 2003 (the date of the last declaration) to supplement the ORP writeup. ORP discussed the declaration with EM-5 during their visit to the site the week of September 22, 2003. EM-5 proposed minor modifications, which were incorporated into the declaration issued September 30, 2003.

2.10 DOE-Headquarter (DOE-HQ) Review of Suspect/Counterfeit Item (SCI) Programs

DOE-HQ personnel from EM-1 visited Hanford to examine Suspect/Counterfeit Item (SCI) programs. Preliminary feedback indicates concerns regarding the following:

- Lack of specific review of procured hoisting and rigging material (CH2M HILL)
- Documentation of SCI training (CH2M HILL)
- Rigor of defining SCI roles/responsibilities and reporting requirements (BNI/CH2M HILL)
- Comprehensive Self Or Independent Assessment Of SCI Program (ORP/CH2M HILL/BNI)

These issues were discussed with the responsible contractor management and no further contractor action is expected

2.11 WTP Fire Protection

ORP issued ORP/OSR-2003-13, *Office of River Protection Position on Adequacy of Performance-Based Methodology for Determining the Need for the Fire Protection of Structural Steel*, Rev. 0, on September 2, 2003. At the same time, BNI submitted ABAR 24590-WTP-SE-ENS-03-431, Rev. 0, "Tailoring of DOE-STD-1066-97 to Include Performance Based Steel Fire Proofing," requesting ORP approval of SRD tailoring to allow use of a performance-based approach to determine the need to fireproof structural steel elements within WTP process

buildings. ORP disapproved the ABAR¹ on the basis that both DOE-STD-1066-97 and ORP/OSR-2003-13 allow the use of alternate approaches to the fire protection methods specified in these documents. However, use of these alternate approaches is contingent on DOE approval as the Authority Having Jurisdiction. The ORP/OSR-2003-13 can be accessed at: <http://www.hanford.gov/osr/documents/2003-13%20Position%20on%20Need%20for%20Fire%20Protection.pdf>

2.12 Revised Risk Assessment Work Plan (RAWP)

DOE submitted the revised RAWP to Ecology for their review and approval on August 15, 2003, as scheduled. The Risk Assessment evaluates human health and ecological risk from the operation of the WTP. The revised RAWP incorporates comments from Ecology and the Environmental Protection Agency.

2.13 CH2M HILL Implementing Documentation for Chronic Beryllium Disease Prevention Program (CBDPP)

ORP and DOE Richland Operations Office (RL) completed their review of the CH2M HILL portion of the Hanford CBDPP. The document was reviewed against the agreed to requirements defined in the Hanford CBDPP. CH2M HILL proposed satisfactory resolutions to all comments identified by DOE. Approval of the documentation supporting the revised CBDPP was issued by letter dated August 28, 2003.²

2.14 BNI Quality Assurance (QA) Manual Review

In July, ORP met with the BNI QA Manager to resolve questions from their review of the 10 CFR 830.121, mandated annual submittal of QA Program changes. The BNI QA Manager issued amended pages which address ORP direction to incorporate Revision 13 of the Office of Civilian Radioactive Waste Management's Quality Assurance and Requirements Description. The ORP reviewed the amended pages and completed its review of the QA Manual. During the month of August, ORP met with the BNI QA Manager to resolve one remaining issue on the proposed revision to the BNI QA Manual. The remaining issue dealt with BNI's request for an *a priori* approval of to-be-issued versions of the standard for qualifying Nondestructive Examination personnel. The BNI QA manager issued amended pages eliminating this request. The ORP reviewed the amendment, completed its written evaluation, and the ORP Manager approved the QA Manual on August 29, 2003.³ The approval report of Deliverable 7.2 can be accessed at the following link:

<http://www.hanford.gov/osr/documents/03-OSR-0271%20Approve%20QAM%20Rev.%204A%20letter.pdf>

¹ ORP letter from R. J. Schepens to J. P Henschel, BNI, "Disapproval of Authorization Basis Amendment Request (ABAR) 24590-WTP-SE-ENS-03-431, Revision 0, Tailoring of DOE-STD-1066-97 to Include Performance-based Steel Fire Proofing," 03-OSR-0347, dated September 17, 2003.

² ORP letter from R. J. Schepens to J. P. Henschel, BNI, "Approval of Implementing Documentation Supplementing the Hanford Site Chronic Beryllium Disease Prevention Program (CBDPP)," 03-ESQ-055, dated August 28, 2003.

³ ORP letter from R. J. Schepens to J. P Henschel, BNI, "U.S. Department of Energy, Office of River Protection 9ORP) Approval of Deliverable 7.2, Quality Assurance Manual (QAM) 24590-WTP-QAM-QA-01-001, Revision 4A," 03-OSR-0271, dated August 29, 2003.

2.15 Integrated Safety Management (ISM) Performance Objectives, Measures, and Criteria (POMC)

ORP received ISM-related POMCs from BNI, as required by contract. The POMCs are oriented to Industrial Health and Safety only. ORP staff met with the responsible BNI management to discuss adding items related to feedback, environment, and improvement actions.

2.16 FY 2003 Hanford Federal Agreement and Consent Order (HFACO) Milestone Status

All seven of the enforceable milestones scheduled for completion in September were completed as planned. There were twenty-five HFACO commitments in FY 2003, twenty-three were completed early, one completed on schedule, and one completed late by one day. For FY 2004 there are twenty-nine HFACO commitments and five have already been completed ahead of schedule. All remaining commitments for FY 2004 are either on or ahead of schedule.

2.17 M-62-03-02, "WTP Construction/Operations," Change Request

ORP and Ecology have reached tentative agreement on actions to reconcile the WTP contract construction milestones and the HFACO. The agreement includes alignment of HFACO Milestones M-62, M-47, and M-90 further supporting joint agreement for the acceleration of tank waste treatment. ORP and Ecology have signed an extension to July 2, 2003, to finalize the change requests for M-62, M-47 and M-90. [Proposed changes have been released for public review and comment; public comment period anticipated to close in October 2003.]

2.18 FY 2003 Summary Management Review (SMR) Memorandum of Assurance

The FY 2003 SMR included a review of two Single-Shell Tank (SST) Action Plan items dealing with anticipated problems in meeting the retrieval and closure dates for the Hanford High Level Mixed Waste SSTs. First, tank integrity assessment and current operational practices to store wastes safely are the subject of continued negotiations with Ecology. A negotiated approach to mitigate the non-compliance with requirements of the regulations is being conducted. Secondly, Ecology and the DOE have negotiated a path forward for retrieval and closure outlined in the M-45 HFACO series SST retrieval and closure milestones. DOE is pursuing acceleration of SST retrieval actions as part of its accelerated closure activities. Further negotiations are scheduled to revise existing milestones to support accelerated retrieval and closure as discussed in a previous paragraph (Section 2.17).

2.19 Double-Shell Tank (DST) Part B Permit

ORP staff completed review of the DST Part B Permit application submitted by CH2M HILL. ORP approved the application and submitted it to Ecology two days ahead of schedule. ORP is waiting for comment from Ecology.

2.20 HLW Building Height

ORP continued to meet periodically with BNI to discuss the effect of the HLW building seven-foot height increase on design and construction of near-term walls at -21 ft. below grade. ORP

and BNI reached agreement that the technical approach described by BNI for near-term wall construction appears to be an acceptable commercial risk. ORP continues to review information relative to the technical approach proposed by BNI concerning the design of these two walls.

2.21 Revised Criteria and Review Approach Documents (CRAD) for Defense Nuclear Facilities Safety Board (DNFSB) Recommendation 2002-1

In its response to DNFSB Recommendation 2002-1, DOE committed to extensive assessments of computer software. The assessments require development of CRAD. The CRAD were prepared by DOE-HQ and distributed to the field for comment. ORP incorporated comments from DNFSB, ORP and other reviewers and provided the revised CRAD to DOE-HQ.

2.22 ORP Implementing Directive (ORPID) Consolidation

During the months of June and July, the ORPID ORP M 450.4, "Integrated Safety Management System Description" was revised to consolidate 24 ORPIDs into three. ORPID ORP M 414.1, "Quality Assurance Program Description," also was revised to combine ten ORPIDs into a comprehensive statement of the ORP Quality Assurance program. This action included preparing a fully revised Quality Assurance Program Description for ORP.

2.23 CH2M HILL Review of the 241-TX Lance Event

In May 2002, while moving the 241-TX water lance, diluted tank waste was spilled onto portions of a craftsman's right arm and thigh, which were covered by coveralls. On June 4, 2003, during a pre-job brief for work involving tank intrusive activities, the previously exposed worker exercised his stop work authority due to concerns that corrective actions were not fully implemented. As a result of the stop work, CH2M HILL conducted a review of the corrective actions from the May 2002 event and determined that they were not fully implemented. An operations standing order was issued to address the immediate concerns and the stop work order was lifted.

2.24 Canister Storage Building (CSB) RCRA Part B Permit

ORP submitted certified RCRA permit applications in June to Ecology for the Immobilized HLW Canister Storage Building and the Integrated Disposal Facility. These certified permit submittals satisfied HFACO Milestones 20-056 and 20-057 respectively.

2.25 Review of the BNI Safety Requirements Document (SRD)

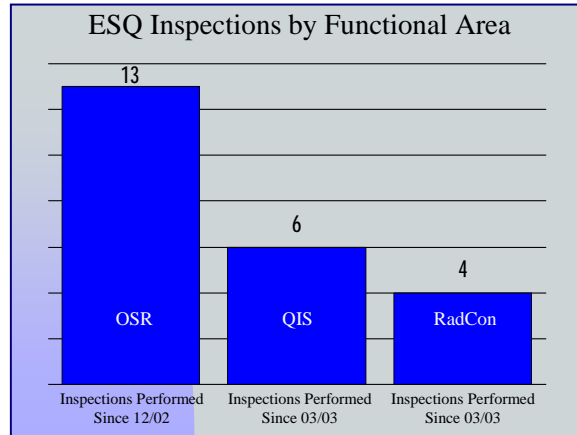
The ORP issued a letter on June 12, 2003,⁴ partially approving extensive revision of the SRD safety criteria. Negotiations will continue concerning the revision of the remainder of the BNI proposed safety criteria changes.

http://www.hanford.gov/osr/documents/03-OSR-0211_Approve_ABAR_ENS-02-002.pdf

⁴ ORP letter from R. J. Schepens to J. P. Henschel, BNI, "Partial, Conditional Approval of Bechtel National, Inc. (BNI) Authorization Basis Amendment Request (ABAR) 24590-WTP-SE-ENS-03-002, Revision 0," 03-OSR-0211, dated June 12, 2003.

2.26 Assessment of CH2M HILL Procurement, Inspection, and Acceptance Testing

In June, ESQ performed an assessment of the procurement, inspection, and test processes at the Tank Farms. Although three weaknesses in testing were cited, the procurement and inspection processes were determined to be strong.



2.27 Authorization Basis (AB) Maintenance Inspection

ORP completed an AB Maintenance Inspection of the WTP design and exited on September 23, 2003. The quality of BNI safety evaluations has improved since the last inspection in January 2003. However, problems still exist in the communication of evaluation issues between BNI Engineering and the Environmental and Nuclear Safety staff. Consequently, several instances were identified where design changes were processed without providing the change notification to ORP for prior approval. One instance is the placement of HLW wall 36 before completing its seismic analysis. Conversely, ORP found that the procedures governing the AB maintenance process were improved. The inspection report is scheduled for an October 20, 2003, issuance.

2.28 Assessment of CH2M HILL Quality Assurance Program, Personnel Training and Qualification

During the week of August 18, 2003, ORP staff reviewed CH2M HILL's plans and procedures for their quality assurance program, and personnel training and qualification activities. The assessors concluded CH2M HILL had developed and implemented an effective quality assurance program including processes for stop work, lessons learned, and the flow down of environmental regulatory requirements. The assessors concluded CH2M HILL had established and implemented an effective training program, and that they had established processes to qualify personnel and verify education and experience.

Issues identified by ORP included the destruction of personnel suitability records where the contractor had not maintained records to enable confirmation that personnel education and experience had been verified.

2.29 SRD Design Standards Implementation Inspection

ORP completed inspection of BNI activities involving the incorporation of SRD design standards implementation using Inspection Technical Procedure (ITP) I-110. Exit meetings were conducted on July 25, 2003. The SRD design standards implementation inspection identified two Findings concerning the code editions of SRD daughter standards being used in the project design activities and deficiencies in BNI's Corrective Action Program.

ORP issued the Design Standards Implementation Inspection Report to BNI on September 4, 2003.⁵ The inspection assessed the Contractor's implementation of the design implementing codes and standards stipulated in the SRD, and the Contractor's process for evaluating and dispositioning deviations from these codes and standards. The report concludes that breakdowns occurred in both the Contractor's implementation of SRD design codes and standards, and in the corrective action process for discrepancies identified in the implementation of SRD design codes and standards. The Contractor is requested to provide written responses to the Findings within 30 days. The report (A-03-OSR-RPPWTP-016) can be access through the following web link: <http://www.hanford.gov/osr/documents/03-OSR-0301%20Design%20Standards%20Report%20letter.pdf>

2.30 Configuration Management (CM) Inspection

ORP completed the CM Inspection and exited on July 25, 2003. No Findings were identified. The Contractor CM Program was considered adequate with improvements in program and implementation subsequent to last year's inspection. Three Assessment Follow-up Items were assigned: (1) Follow the CM Path Forward letter, which corrects a series of BNI self-identified deficiencies and further enhances CM for the operational phase; (2) Follow the design control process which does not presently fully embrace CM principles for large and complex design changes; and(3) Follow the deletion of Design Change Authorizations (DCAs) from the CM Database because they are not official design change documents in the present program. The report⁶ (A-03-OSR-RPPWTP-017) can be access through the following web link: <http://www.hanford.gov/osr/documents/03-OSR-0302%20CM%20letter.pdf>

2.31 Assessment of CH2M HILL Price-Anderson Amendments Act (PAAA) Noncompliance Corrective Actions

During the week of July 14, 2003, the QIS Team conducted an informal assessment of CH2M HILL's root cause analyses and corrective actions to correct three significant PAAA noncompliances. These noncompliances were discussed in an enforcement conference with the DOE-Headquarters Office of Price-Anderson Enforcement during the week of July 28, 2003. The assessment found that the noncompliances have generally been resolved and appropriate corrective actions have been implemented. CH2M HILL agreed to change their analysis to address the failure of operators to detect inadvertently isolated safety equipment. CH2M HILL had inappropriately decided the failure to detect the isolated equipment was not part of the noncompliance they were resolving.

2.32 CH2M HILL Design, Software QA and Operations Assessment

ORP conducted assessment fieldwork July 7 through 11, 2003. Notwithstanding two preliminary observations, the CH2M HILL processes for Design, Software QA, and Operations Configuration Management were determined to be adequate.

⁵ ORP letter from R. J. Schepens to J. P Henschel, BNI, "Safety Requirements Document (SRD) Design Standards Implementation Inspection Report A-03-OSR-RPPWTP-016," 03-OSR-0301, dated September 4, 2003.

⁶ ORP letter from R. J. Schepens to J. P Henschel, BNI, "Configuration Management (CM) Inspection Report A-03-OSR-RPPWTP-017," 03-OSR-0302, dated September 2, 2003.

3.0 NEAR-TERM REGULATORY ACTIONS AND ACTIVITIES

Planned activities for the next 90 days include the following:

Office of Environmental Safety and Quality (ESQ)
October - December - 2003

- Conduct the following inspections of WTP activities:
 - As low as reasonably achievable (ALARA) Design Inspection
 - Design Process Inspection
- Update Radiological Protection Program review guidance.
- Update Radiation Safety Inspection procedures.
- Finish review of BNI's important-to-safety (ITS) reclassification submittal.
- Continue review and approval of ABARs.
- Continue review of BNI's updated PSAR.
- FY 2004 and FY 2005 Budget Formulation actions.
- FY 2003 Year-End closing and funds management actions.
- Complete review of the Final Tank Closure EIS data packages.
- Issue Draft Tank Closure EIS.
- Assist in completion of Final Hanford Solid Waste (HSW) EIS.
- Complete Environmental Management System (EMS) Compliance Study.
- Assist in issuance of the Record of Decision (ROD) for HSW EIS.
- Review and submittal of additional WTP RCRA permit design packages.
- Review Land Disposal Restriction (LDR) Treatment Petition.
- Review and submittal of WTP Risk Assessment Work Plan.
- Revise procedures for internal ORP quality assurance.

4.0 ACRONYMS

AB	authorization basis
ABAR	Authorization Basis Amendment Request
BNI	Bechtel National, Inc.
CBDPP	Chronic Beryllium Disease Prevention Program
CH2M HILL	CH2M HILL Hanford Group, Inc.
CRAD	Criteria and Review Approach Documents
DBE	Design Basis Event
DNFSB	Defense Nuclear Facility Safety Board
DOE	U.S. Department of Energy
DSA	Document Safety Assessment
DST	Double Shell Tank
EIS	Environmental Impact Statement
EM	Environmental Management
HFACO	Hanford Federal Facility Agreement and Consent Order
HLW	High Level Waste
HSW	Hanford Solid Waste
ISM	Integrated Safety Management
ITP	Inspection Technical Procedure
ITS	important-to-safety
LAW	Low Activity Waste
NOI	Notice of Intent
NRC	U.S. Nuclear Regulatory Commission
OIG	Office of Inspector General
ORP	Office of River Protection
OSR	WTP Safety Regulation Division
PAAA	Price-Anderson Amendments Act
PNOV	Preliminary Notice of Violation
POMC	Performance Objectives, Measures, and Criteria
PSAR	Preliminary Safety Analysis Report
QA	Quality Assurance
QIS	Quality and Industrial Safety
RAWP	Risk Assessment Work Plan
RCRA	Resource Conservation and Recovery Act
ROD	Record of Decision
RPP	River Protection Project
SCI	Suspect/Counterfeit Item
SER	Safety Evaluation Report
SMR	Summary Management Review
SRD	Safety Requirements Document
SST	Single Shell Tank
TRUM	Transuranic Mixed Waste
WTP	Waste Treatment and Immobilization Plant